UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

March 2, 2022

ACTION MEMORANDUM

SUBJECT: Request for Continued Consistency Exemption from Statutory Limits and Ceiling Increase for the Ongoing Non-Time Critical Removal Action at the Mississippi Phosphates Corporation National Priorities List Site, Pascagoula, Jackson County, Mississippi.

FROM: Craig Zeller, P.E.
Remedial Project Manager
Region 4 Superfund & Emergency Management Division
CRAIG ZELLER — Digitally signed by CRAIG ZELLER Date: 2022.03.02 10:31:02 -05'00'

THRU: Nestor Young, Chief
Restoration & Site Investigations Section
Region 4 Superfund & Emergency Management Division
NESTOR YOUNG — Digitally signed by NESTOR YOUNG Date: 2022.03.02 14:55:46 -05'00'

H. Glenn Adams, Chief
Restoration & Site Evaluation Branch
Region 4 Superfund & Emergency Management Division
Adams, Glenn — Digitally signed by Adams, Glenn Date: 2022.03.02 14:59:12 -05'00'

Carol J. Monell, Director
Region 4 Superfund & Emergency Management Division
CAROL MONELL — Digitally signed by CAROL MONELL Date: 2022.03.09 15:51:26 -05'00'

Daniel Blackman, Administrator
Region 4
DANIEL BLACKMAN — Digitally signed by DANIEL BLACKMAN Date: 2022.03.21 17:01:22 -04'00'

Kathleen Salyer, Director
Office of Emergency Management
DONNA SALYER — Digitally signed by DONNA SALYER Date: 2022.03.28 08:40:55 -04'00'

Larry Douchand, Director
Office of Superfund Remediation and Technology Innovation
LARRY DOUCHAND — Digitally signed by LARRY DOUCHAND Date: 2022.03.28 10:34:15 -04'00'

Barry Breen, Acting Assistant Administrator
Office of Land and Emergency Management
BARRY BREEN — Digitally signed by BARRY BREEN Date: 2022.03.30 22:07:07 -04'00'

TO: Michael S. Regan, Administrator
U.S. Environmental Protection Agency

I. PURPOSE

The purpose of this Action Memorandum (Action Memo) is to request approval for a Ceiling Increase and continuation of the consistency exemption to the $2 million and 12-month statutory limits for this Non-Time-Critical Removal Action (NTCRA).

On April 18, 2018, former U.S. Environmental Protection Agency Administrator Scott Pruitt approved an Action Memorandum (2018 Action Memo) to conduct a NTCRA at the Mississippi Phosphates

Corporation (MPC) National Priorities List (NPL) Site in Pascagoula, Jackson County, Mississippi. The scope of the NTCRA involves closure of the East Gypsum Stack (EGS), closure of some ponds and ditches that had been used in the water treatment process (Pond 5, Pond 6, and the North Ponds), and continued water treatment activities to prevent an uncontrolled release of untreated water to the adjacent Grand Bay National Estuarine Research Reserve and Bayou Casotte. On December 14, 2020, former EPA Administrator Andrew Wheeler approved an Action Memo that raised the total NTCRA ceiling to $150,626,523. The currently approved project ceiling includes $75,602,917 for EGS closure and $75,023,606 for water treatment. This is the eighth Action Memo issued for the MPC Site: an Action Memo for a time-critical removal action, followed by four requests for ceiling increase; and an Action Memo for a non-time-critical removal action, followed by two requests for ceiling increase. The previous Action Memos were: 09/15/16 (#1), 04/19/17 (#2), 05/26/17 (#3), 09/22/17 (#4), 11/17/17 (#5), 04/18/18 (#6), and 12/14/20 (#7).

East Gypsum Stack Closure: EGS closure work started in November 2018, and thus far, there has been approximately $39 million placed on awarded contracts for Phase 1A (west slope), Phase 1B (south slope), cover system materials, and the initial subgrade preparation for the Phase 1C footprint (NE slope). The Phase 1C HUB-Zone contract for full-scale closure of the NE slope, Water Return Ditch (WRD) and Pond 5 was awarded on September 29, 2021, for approximately $35 Million. The current $75.6 Million ceiling should be adequate to complete Phase 1C in 2022 and 2023. However, Phase 2, which involves closure of Pond 6, is scheduled for 2024 and is estimated to cost $15 Million. In addition, Phase 3, which involves closure of the North Ponds, is scheduled for 2025 and is estimated to cost $5 Million. Therefore, this Action Memo requests that the EGS closure ceiling be increased $20 Million from $75,602,917 to $95,602,917, so there is adequate ceiling space to fully complete all three Phases of EGS closure work.

Water Treatment and Site Stabilization: This Action Memo also requests a Ceiling Increase for ongoing water treatment and site stability operations. The current ceiling for this work is $75,023,606. Since rainwater is now diverted off 100 acres of the covered Phase 1A/Phase 1B slopes, some reduction in water treatment costs have been realized. Water treatment costs in 2021 have averaged $850,000/month (≈ $10 Million/year), down from an historical average of $1.3 Million/month (≈ $16 Million/year). Water treatment costs are expected to remain stable in 2022 ($10 Million) and 2023 ($10 Million) until completion of Phase 1C when the remaining acid-generating material is covered, and long-term collection/treatment of leachate is initiated. The transition to collection/treatment of leachate *only* is expected to take two years (2024/2025) while Phase 2 and Phase 3, described above, are completed. A Focused Feasibility Study completed in August 2021 estimated the monthly costs of lime precipitation to treat leachate at 1,000 gallons/minute at $298,000 (≈ $ 4 Million/year for 2024/2025). Therefore, this Action Memo requests that the water treatment ceiling be increased an additional $28 Million for water treatment operations through 2025, for a total water treatment ceiling of $103,023,606.

This Action Memo raises the total NTCRA ceiling an additional $48 Million for a total of $198,626,523 ($95,602,917 for EGS closure + $103,023,606 for water treatment). Please see Figure 1 (attached) for the relevant MPC site features.

II. SITE CONDITIONS AND BACKGROUND

Site Name: Mississippi Phosphates Corporation
CERCLIS ID: MSD077909133
Superfund ID: B45U
Latitude: 30°22'26.25"N; Longitude: 88°29'25.21"W
Physical Address: 601 Industrial Road; Pascagoula, MS 39581
Response Authority: CERCLA
Response Type: Non-Time-Critical Removal Action
Response Lead: EPA Region 4
NPL Status: Proposed 08/03/17; Final 01/18/18
Action Memorandum: 04/18/18
Non-Time-Critical Removal Start: 05/25/18

MPC manufactured Diammonium Phosphate (DAP) fertilizer at its Pascagoula facility from the late 1950s thru December 2014. On October 27, 2014, MPC and its subsidiaries filed for Chapter 11 bankruptcy protection. All fertilizer production at the facility ceased in December of 2014. In general, the fertilizer production process involved reacting phosphate ore with sulfuric acid to produce phosphoric acid. Ammonia was then added to produce a granulated N-P-K fertilizer product. The first step in the process produced a waste known as gypsum that was slurried to the West and East Gypsum Stacks. The gypsum waste has residual acidity and contains high levels of nutrients (phosphorus/ nitrogen). The West Gypsum Stack (WGS) was closed out by MPC in the mid-2000s and generates an estimated 20,000 gallons/day of water that must be treated as part of this NTCRA. The EGS, which has not yet been completely closed out, contains about 15 million cubic yards (CYs) of material. Because of the large footprint (~350 acres) of acid-generating material exposed in the EGS, one inch of rainfall produces about nine million gallons (MGs) of impacted water that must be stored and subsequently treated before discharge to Bayou Casotte. The average rainfall in this area of the Gulf Coast is 66 inches/year. The site received 112 inches of rain in 2017, 80 inches in 2018, 57 inches in 2019, 55 inches in 2020 and 87 inches in 2021. In 2021, the EPA discharged 927 million gallons of water into the bayou at a rate of about 2.54 million gallons per day.

The majority of wastewater stored on-site has a pH of approximately 2 to 3 which is acidic enough to be a pollutant or contaminant and just above the pH level that would make it a hazardous substance. This water also contains high levels of ammonia and phosphorus. Ammonia concentrations in the EGS water range from 300 to 500 mg/L, while phosphorus concentrations range from 4,000 to 8,000 mg/L. Both of these hazardous substances are present at levels of concern. Radionuclides and other chemicals are analyzed for in wastewater but have not been detected at levels of concern. These pollutants or contaminants and hazardous substances pose a significant threat to the surrounding surface water bodies and ecosystems should they be discharged from the MPC site as untreated and uncontrolled releases. Potential impacts include pH shock and nutrient loading. Nutrient loading can spur blooms of algae that increase chemical and biochemical oxygen demand in the receiving waters. Numerous releases have been documented from the MPC Site that caused significant harm to Bayou Casotte and Grand Bay National Estuarine Research Reserve. Ecological effects have included negative impacts to vegetation/habitat, aquatic resources (benthic/fish/shellfish) and wildlife.

Pursuant to the July 2015 bankruptcy settlement, two trusts were created to manage the remaining assets: A Liquidation Trust to market and sell facility assets; and an Environmental Trust to maintain the gypsum stacks and operate the wastewater treatment plant (WWTP) to the extent of its assets.

The Environmental Trust became insolvent on February 10, 2017 and was no longer able to operate the WWTP or maintain the gypsum stacks. On February 11, 2017, the EPA Region 4 Removal Program under the Superfund and Emergency Management Division (SEMD) assumed oversight, management and funding of wastewater treatment operations and gypsum stack maintenance as a time-critical removal action. On May 25, 2018, the water treatment and site stability operations were transitioned to the EPA Region 4 Remedial Program under the SEMD as a NTCRA. These operations are being implemented by Kemron, the EPA Emergency Response and Rapid Services (ERRS) Contractor. On July 31, 2020, all remaining Trust assets, including all site property and infrastructure, were transferred to the Environmental Trust, and the Liquidation Trust was dissolved.

Leachate, wastewater and contact stormwater at MPC are treated by a combination of mechanical and in-situ techniques. The mechanical WWTP consists of lime precipitation with a clarifier. The mechanical WWTP was inherited from MPC and has an average treatment capacity of about one million gallons per day (MGD). Lime at MPC is utilized twice. Lime sludge with residual neutralization capacity from the mechanical WWTP clarifier is mixed with leachate from the WGS and other site wastewater and then pumped to the Geo-Tube disposal area in Pond 6 (EGS Closure Area). Polymer is introduced to promote coagulation and capture of lime sludge solids in Geo-Tubes. The Geo-Tubes dewater under gravity and produce a partially treated water stream that is mixed with mechanical plant water before it is discharged to Bayou Casotte (Outfall 002). Sampling and analysis are conducted frequently at on-site and off-site laboratories to monitor pH, loading of phosphorus/ nitrogen/flouride to the bayou, and miscellaneous metals, etc. The table below provides a summary of water treatment metrics:

YEAR	ANNUAL RAINFALL (INCHES)	TOTAL DISCHARGED BAYOU CASOTTE (MILLION GALLONS)	DAILY AVERAGE (MGs/DAY)
2017	112	1,301	4.14
2018	80	926	2.54
2019	57	852	2.33
2020	55	711	1.95
2021	87	927	2.54
TOTAL		≈ 4.7 Billion Gallons	
Notes: Average annual rainfall = 66 inches Total water treatment costs to date ≈ $72.5 Million (through January 2022)			

The EPA initiated closure of the EGS complex in November 2018, with the west slope (Phase 1A). The Pre-Final Construction Inspection was held on April 29, 2020, and the Final Construction Inspection was successfully conducted on July 1, 2020. In general, the work completed involved subgrade preparation, access road construction along the crest, placement of seven drainage bridges and associated storm water piping across the water return ditch (WRD), and installation of 51 acres of 50-mil grip net liner and 49 acres of the ClosureTurf® cover system. Total costs to build Phase 1A were $14.3 million. This cost included $6.2 million for earthwork, $5.3 million for cover system materials and $2.8 million for cover system installation.

Closure of the south slope (Phase 1B) was initiated in November 2019, and work was completed by December 2020. The Pre-Final Construction Inspection was held on December 9, 2020. No outstanding punch list items were identified so a Final Construction Inspection was not warranted. In general, the

work completed involved subgrade preparation, access road construction along the crest, placement of eight drainage bridges and associated storm water piping across the WRD and installation of 48 acres of 50-mil grip net liner and 46 acres of the ClosureTurf cover system. Total costs to build Phase 1B were $12.2 Million. This included $6.2 Million for earthwork, $2.4 Million for cover system installation and $3.6 Million for cover system materials.

Preparation of the Phase 1C subgrade was initiated in late March 2021. While the HUB-Zone procurement process continued, a new Task Order was finalized with the EPA Region 2 to access its ERRS contract via a Cross-Over. This contracting strategy allowed Kemron to begin working on the NE slope topographic surface, so that the cover system can be installed on a more expedited basis when the Phase 1C build out contract is awarded. The new Task Order was initially funded with $4 Million. By January 2022, the 70 total acres on the Phase 1C footprint had been graded and compacted to +6 inches of final grade, although the surface has degraded some due to heavy rains.

The HUB-Zone contract for the full Phase 1C build-out was awarded on September 29, 2021, for approximately $35 Million. The Phase 1C kick-off meeting at the site was held on October 19, 2021. Work crews will mobilize in early February 2022 to implement the approved design approach.

The MPC Site has been divided into four operable units (OUs): OU-1 encompasses soil contamination at the 106-acre former manufacturing plant area; OU-2 encompasses both gypsum stacks and their related ponds; OU-3 is limited to the gypsum stack leachate management system; and OU-4 will encompass site-wide groundwater, along with the adjacent Bayou Casotte and Grand Bay Estuary. A site-wide strategy has been developed to address all four operable units of the site and to ensure that water treatment operations are transferred to the State of Mississippi when EGS closure is completed:

- A Remedial Investigation is underway at OU-1, the 106-acre former manufacturing plant area.
- This NTCRA is addressing OU-2 by closing the gypsum stacks, ponds and ditches. The EPA will conduct a remedial investigation/feasibility study for OU-2 after the NTCRA is complete. The OU-2 remedy will include institutional controls to ensure that closure of the gypsum stacks is protective in the long-term. Mississippi will conduct OU-2 operation and maintenance activities in the long-term.
- A Focused Feasibility Study (FFS) was conducted for OU-3 in August 2021 that evaluated long-term technical applicability of leachate/contact water (L/CW) treatment options at the site. The FFS evaluated lime precipitation, Reverse Osmosis (RO), and Underground Injection Control (UIC) as they are the most promising technologies and are representative of technologies successfully used at other sites similar to MPC. The FFS concluded that lime precipitation offers the best combination of implementability, effectiveness and cost. The technology is already in place, has a proven record of meeting discharge requirements, and has a lower estimated long-term cost than the other two options. The EPA will select a remedy for OU-3 in 2023 after Phase 1C of the OU-2 NTCRA is complete.
- Work at OU-4 has not yet begun.

This is the eighth Action Memo issued for the MPC Site. The previous Action Memos were: 09/15/16 (#1), 04/19/17 (#2), 05/26/17 (#3), 09/22/17 (#4), 11/17/17 (#5), 04/18/18 (#6), and 12/14/20 (#7).

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the site continue to pose the following threats to public health or welfare or the environment based on the factors in 40 CFR § 300.415(b)(2):

Section 300.415(b)(2)(i): Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances, pollutants or contaminants;

The site is immediately adjacent to the Grand Bay National Estuarine Research Reserve on the east and Bayou Casotte to the west. Depending on the location of an uncontrolled release of untreated water, either of these water bodies could be impacted by a discharge of wastewater from the site. During an uncontrolled release, the immediate toxicity to the bayou is attributed to low pH (typically <2.5) which can result in an immediate fish kill. Acidic pH conditions combined with elevated levels of nutrients (phosphorus/nitrogen) in site wastewater increase the risk of fish kills associated with eutrophication, particularly harmful algal blooms, within and beyond Bayou Casotte.

Past events have demonstrated that releases of untreated or partially treated wastewater from the site can result in massive fish kills. For example, an April 2005 discharge of 17 million gallons to Bangs Lake within Grand Bay Estuary killed thousands of fish and decimated a large area of aquatic vegetation. MPC pled guilty in 2015 to a criminal violation of the Clean Water Act for discharging more that 38 million gallons of wastewater to Bayou Casotte, killing an estimated 47,000 fish.
Section 300.415(b)(2)(ii): Actual or potential contamination to drinking water or sensitive ecosystems;

Bangs Lake and the Grand Bay National Estuarine Research Reserve on the eastern boundary of the site are considered among the most productive nurseries for aquatic species on the Gulf Coast and are at significant risk of adverse impact should a significant release of untreated wastewater from the site occur. As noted previously, fish kills in Bayou Casotte and the Grand Bay Estuary have been documented due to uncontrolled releases of untreated wastewater while MPC was operational. The causes of these releases and emergency bypasses in the past have been attributed to heavy rains (tropical storms/hurricanes) exceeding site storage capacities, mechanical WWTP failures, overtopping of berms by wind and/or overflow by failure of the berm system.

Section 300.415(b)(2)(v): Weather conditions that may cause hazardous substances or pollutants of contaminants to migrate or be released;

One inch of rainfall on-site generates approximately nine million gallons of water that must be subsequently captured, stored and treated before discharge to the bayou. Large precipitation events have the potential to overwhelm water management systems on the site. The site is located along the coastline of the Gulf of Mexico and is vulnerable to severe weather events such as tropical storms/hurricanes. The site has been impacted by multiple hurricanes in the past (Katrina/Isaac), which led to uncontrolled releases and fish kills in Bayou Casotte. Two hurricanes in 2017 (Harvey/Nate) required emergency bypasses of partially treated water to prevent uncontrolled releases. More recently in 2021, several unnamed storms and Hurricane Ida delivered excessive amounts of rainfall in short periods of time that required contingency water diversions and caustic additions to adjust pH before discharge to the bayou.

Section 300.415(b)(2)(vii): The availability of other appropriate federal and state response mechanisms to respond to the release;

Given the potential size and scope of the action, state resources are insufficient to address the threats in a timely manner. No other governmental entity has funds available to conduct the necessary removal activity.

IV. ENDANGERMENT DETERMINATION

The actual or threatened releases of hazardous substances and pollutants or contaminants from this site, as described in the 2018 Action Memo, will continue to present an imminent and substantial endangerment to public health or welfare or the environment if not addressed by implementing the response action selected in the Action Memo dated 12/14/20 and this Action Memo.

V. EXEMPTION FROM THE STATUTORY LIMITS

It is appropriate to extend the consistency waiver granted by the 2020 Action Memo because the ongoing NTRCA is necessary to avoid a foreseeable threat and is consistent with the future remedial actions planned for this site. Continued water treatment is necessary to prevent uncontrolled releases of acidic/nutrient-laden water into the adjacent Grand Bay National Estuarine Research Reserve and Bayou Casotte. One inch of rainfall produces about nine million gallons of impacted water that must be stored and subsequently treated before discharge. Similarly, completing the closure of the EGS is essential to eliminate rainfall contact with acid-generating material that will result in the need (and cost) to treat precipitation and contact water.

The NTCRA is a key component of the overall site remediation strategy, which divides the site into four manageable operable units. The site-wide remediation strategy includes a Remedial Investigation/ Feasibility Study (RI/FS) at the 106-acre former plant area, an ecological risk assessment that focuses on the bayou and estuary, and selection of a final remedy for the groundwater in the area of the site. The MPC Site was placed on the NPL on January 18, 2018.

VI. PROPOSED ACTION AND ESTIMATED COSTS

This new Action Memo does not change the scope of the NTCRA work to close the EGS as outlined in the 2018 and 2020 Action Memos. As stated above, significant progress has been made in just over three years, including completion of five Design Packages, completion of Phase 1A (west slope cover), Phase 1B (south slope cover) and initial subgrade preparation on Phase 1C. Besides ongoing water treatment activities and site stability operations, the remaining work to be conducted under this Action Memo is summarized below.

Phase 1C: Closure/cover of the NE Slope, Pond 5 and conversion of the WRD from an open leachate collection ditch to a closed leachate infiltration gallery. The work area covers 125 acres and involves 914,000 cubic yards (CYs) of fill and 422,300 CYs of cut. Construction started in 2021with subgrade preparation under the Region 2 ERRS Cross-Over contract for $4 Million. The Phase 1C HUB-Zone contract was awarded on September 29, 2021 for $35 Million. Ten Million ($10 Million) was placed on the Phase 1C contract when it was awarded. The additional funding required to complete Phase 1C will be spread out over the 2022 and 2023 construction years. The current $75.6 Million ceiling should be adequate to complete Phase 1C.

Phase 2: Closure/cover of Pond 6. The work area covers 76 acres and involves 304,000 CYs of fill and 97,000 CYs of cut. Work is scheduled to start in 2024 at an estimated cost of $15 million. The cost for this phase is included in this ceiling increase.

Phase 3: Closure of the North Ponds that were formerly used for treatment of process water with lime. The work area involves four cells, 30 acres in size, that contain 780,000 CYs of spent lime sludge with high moisture content. Cells will be closed in place with a reinforced geotextile system. Work is scheduled to start in 2025 at an estimated cost of $5 million. The cost for this phase is included in this ceiling increase.

Estimated Costs: The estimated costs and ceilings for each phase of the EGS closure are summarized in the table below. Please note that the phasing of EGS closure has been modified since the 2018 Action Memo to move the high priority work areas with acid-generating material into Phase 1 and to accommodate the anticipated funding streams. The new project ceilings have been adjusted to reflect the current construction sequencing envisioned. The funding requested in this ceiling increase is to treat wastewater up through 2025 and to complete all three phases of EGS closure by 2025.

Extramural Costs	**Current Ceiling**	**Requested Increase**	**New Project Ceiling**
Wastewater Treatment Operations	$75,023,606	$28,000,000	$103,023,606
Construction			
Phase 1A + 1B + 1C	$75,602,917	$0	$75,602,917
Phase 2	$0	$15,000,000	$15,000,000
Phase 3	$0	$5,000,000	$5,000,000
Contingency	$0	$0	0
TOTAL REMOVAL ACTION CEILING	$150,626,523	$48,000,000	$198,626,523

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Significant delay in a decision to increase the ceiling for this NTCRA or a decision not to increase the ceiling would halt the ongoing treatment of acidic water emanating from the site, which would likely result in uncontrolled releases of hazardous substances, pollutants or contaminants into the sensitive ecosystems of the nearby Bayou Casotte and Grand Bay National Estuarine Research Reserve during the next heavy rainfall. A decision to delay or decline the request for Ceiling Increase would also delay or prevent complete closure of the EGS. The section of the EGS not yet closed (Phase 1C) continues to expose acid-generating material that produces contact water that must be collected and treated.

Water treatment and site stability costs have averaged $850,00/month in 2021. If these expenditures are not continued and no other funding source is established to maintain stabilization measures, conditions at the site will rapidly deteriorate and result in a significant potential for uncontrolled releases from the site.

VIII. OUTSTANDING POLICY ISSUES

There is no formal agreement with the Mississippi Department of Environmental Quality (MDEQ) to conduct Post-Removal Site Control over the East Gypsum Stack or West Gypsum Stack leachate currently. MDEQ supported listing on the NPL and understands that the state will become responsible for long-term leachate collection and treatment in the future. Per the site strategy, the EPA plans issue a ROD to facilitate the transfer of Operation and Maintenance (O&M) to MDEQ when the Phase 1C EGS closure is completed in 2023.

IX. ENFORCEMENT

Please see the attached Enforcement Addendum for updated enforcement information.

X. RECOMMENDATION

This decision document represents continuation of a NTCRA for closure of the EGS and North Ponds, plus water treatment, at the MPC site located in Pascagoula, Jackson County, Mississippi. The document was prepared in accordance with CERCLA, as amended, and is not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based upon the Administrative Record established for the site. Conditions at the site meet both the NCP Section 300.415(b) criteria for a Removal Action and the CERCLA § 104(c) criteria for a consistency exemption from the $2 million/12-month limitations. I recommend your approval of the NTCRA, the consistency exemption from the $2 million/12-month statutory limits on Removal Actions, and the proposed Ceiling Increase.

SIGNATURE:

APPROVE: Michael S. Regan DATE: APR - 1 2022

Michael S. Regan, Administrator
U.S. Environmental Protection Agency

DISAPPROVE: _____ DATE: _____

Michael S. Regan, Administrator
U.S. Environmental Protection Agency